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UNITED STATES DISTRICT COURT
DISTRICT OF OREGON

UNITED STATES OF AMERICA,

Plaintiff,

v.

**\$12,005.00 IN UNITED STATES
CURRENCY, *in rem*,**

Defendant.

Misc. No. 6:21-mc-851

**UNOPPOSED MOTION TO
EXTEND 90-DAY PERIOD
PURSUANT TO
18 U.S.C. § 983(a)(3)(A)**

On April 30, 2021, Crystal Lee Lynn filed a claim in a non-judicial civil forfeiture proceeding by the Drug Enforcement Administration to \$12,005.00 in United States currency that was seized on or about February 25, 2021.

No other person filed a claim in the administrative forfeiture proceeding.

Claimant Crystal Lynn is not represented by counsel. Undersigned counsel for the United States has attempted to contact Ms. Lynn several times to discuss this matter but has not yet received a response. The United States has been unable to obtain Ms. Lynn's position on this extension.

The United States requests an extension of its complaint filing deadline in this matter in order to give the United States additional time to attempt to contact Ms. Lynn. As provided in 18 U.S.C. § 983(a)(3)(A), the United States moves for an order based on good cause shown to extend the time in which the United States will file a Complaint for Forfeiture against the \$12,005.00 or to obtain an Indictment alleging that the \$12,005.00 in United States currency is subject to forfeiture. The United States requests that the deadline by which the United States shall be required to file a Complaint for Forfeiture against the property and/or to obtain an Indictment alleging that the property is subject to forfeiture shall be extended to November 26, 2021.

Respectfully submitted this 29th day of July, 2021.

SCOTT ERIK ASPHAUG
Acting United States Attorney

/s/Alexis. A. Lien
ALEXIS A. LIEN
Assistant United States Attorney

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I have made service of the foregoing MOTION TO EXTEND 90-DAY PERIOD and a proposed ORDER on the party herein by causing to be deposited in the United States mail at Portland, Oregon, on July 29, 2021, true copies thereof in an envelope with postage thereon prepaid, addressed to:

Crystal Lee Lynn
670 NE Rocky Top Road
Prineville, OR 97754

/s/ Lea Achim
LEA ACHIM
Paralegal